

Konta, Georges, and Buza, P.C.
233 Broadway, 9th Floor
New York, NY 10279
212-710-5166 (Tel.)
212-710-5162 (Fax)
johnpbuza@aol.com

January 31, 2022

VIA ECF

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Asa Saint Clair*, 19 CR 790 (PKC)

Dear Judge Castel:

I represent Asa Saint Clair in the above-captioned proceeding. The case is scheduled to be heard on February 1, 2022, at 3:30 pm for a status conference. On January 11, 2022, I asked the Court to consider changing the terms of Mr. Saint Clair's bail. On January 14, 2022, the Court stated that it will consider this issue at the February 1, 2022 conference. Enclosed with this letter are the details, written by Mr. Saint Clair, about the nature of his proposed work and the curfew that would go with it.

Respectfully Submitted,

/s/

John P. Buza

cc.: AUSA Kiersten Fletcher (via ECF)
 AUSA Tara LaMorte (via ECF)
 AUSA Emily Deininger (via ECF)

January 28, 2022

The Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

RE: United States v. Asa Saint Clair, 19 CR 790 (PKC)

Dear Judge Castel,
Your Honor.

Please let this letter serve as a detailed explanation of the proposed work that I will do if allowed to move to a curfew status as part of the terms of bail regarding my current home confinement.

I was recently accepted to be a contract delivery driver with "Door Dash"; a food delivery service that uses a mobile app for customers to order from local restaurants. As a contract delivery driver, I would receive compensation based upon the number of deliveries completed as well as tips. As my wife worked for Doordash previously, I know this is a viable opportunity where one can earn as much as \$40 per hour depending upon demand. The Door Dash position is a good fit for our family situation as it allows me to work a flexible schedule and at various times of the day. On the other hand, because it is not a set schedule it is overly burdensome to give 48-hour advance notice to Pretrial Services every time I am to leave the house.

The proposed curfew hours would be from 6AM-10PM daily. The Doordash position is a unilateral work relationship whereby I am able to turn on the mobile app if/when I am able to work, with no hard requirements to work at a certain time or number of hours. The Doordash app alerts me as to when and where there is heavy delivery volume. This schedule allows me to work efficiently during breakfast, lunch, or dinner as volume dictates, and as my home life allows.

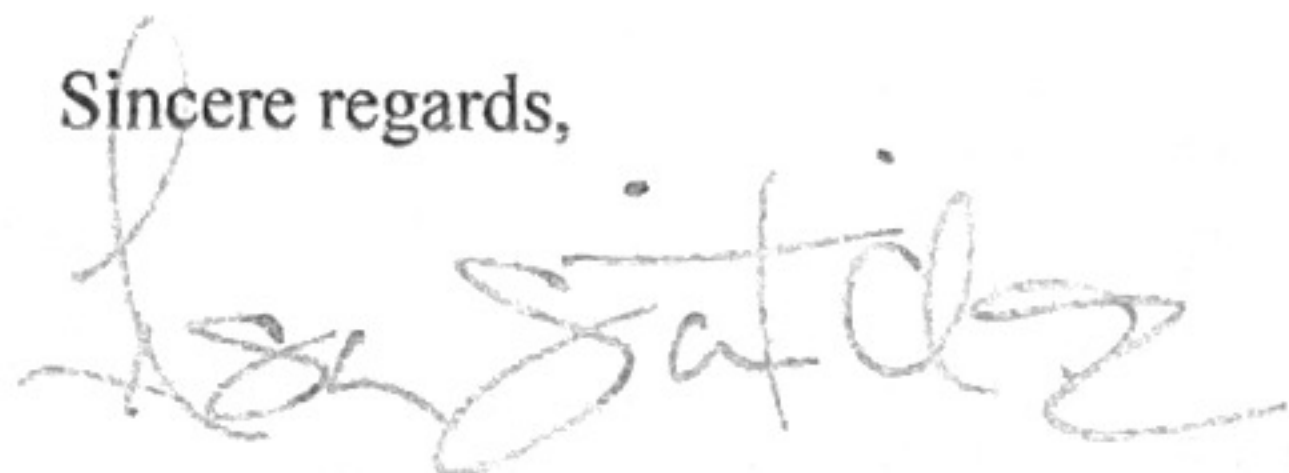
If your honor recalls, we welcomed a newborn child last summer. My wife works a flexible job schedule, and childcare is available to us but not on a set schedule. Therefore, I need to be able to accommodate my wife's work schedule, as well as care for our infant daughter and 4-year-old son at certain times. There are other times when I could be earning money from the Door Dash position and moving to curfew makes this logistically possible.

Based upon my previous work experience, being a Doordash driver is probably not the type of job I would normally contemplate. However, under the circumstances this is what is available to me, and I am not too proud to work at any job that will provide for my family. I have applied for other positions

and have been turned down, in large part due to my current legal status. While I have been contracted for and have completed other work more in line with my skillset, doing management consulting in the areas of health and sustainability, the funding for that has been repeatedly delayed and has now dried up completely due to the Covid Pandemic. At the same time, due to the same pandemic, there is currently a need for more delivery drivers locally and thus this request for bail modification so that I may work in fulfilling that demand.

I thank you in advance for your time and consideration.

Sincere regards,

A handwritten signature in cursive script, appearing to read "Asa Saint Clair". The signature is written in dark ink and is positioned below the text "Sincere regards,".

Asa Saint Clair